

**DeCOTIIS, FITZPATRICK, COLE & GIBLIN, LLP**

Gregory J. Hazley (Att’y ID# 162622016)

61 South Paramus Road, Suite 250

Paramus, New Jersey 07652

(201) 928-1100 | ghazley@decotiislaw.com

*Attorneys for Defendants,*

*Town of West New York and Gabriel Rodriguez*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

MEGAN SCHAFFER,

Plaintiff,

v.

BOROUGH OF PARAMUS; KEN  
RASCHEN in his individual and official  
capacity; JOSEPH “JAY” SEXTON in  
his individual and official capacity;  
ROBERT KAISER, in his individual and  
official capacity; ACE ANTONIO, in his  
individual and official capacity;  
JEANNE WEBER, in her individual and  
official capacity; WILLIAM R.  
COMERY, in his individual and official  
capacity; HECTOR OLMO, in his  
individual and official capacity,

Defendants.

Civil Action No. 2:23-cv-00530-  
BRM-MAH

Civil Action

**CERTIFICATION OF  
GREGORY J. HAZLEY  
IN SUPPORT OF  
MOTION TO REMAND**

I, **GREGORY J. HAZLEY**, being of full age and duly sworn upon my oath,  
deposes and says:

1. I am an attorney-at-law in the State of New Jersey and a partner with the law firm of DeCotiis, FitzPatrick, Cole & Giblin, LLP, which represents Plaintiff Meghan Schaffer in the above-captioned matter.
2. I am personally familiar with the facts in this matter and I make this certification in support of Plaintiff's motion to remand.
3. All defendants were served in this matter through the Borough of Paramus on December 29, 2022, and were also individually served. *See* affidavits of service, attached hereto as **Exhibit A**.
4. As of the date of this certification, no party has filed a responsive pleading in the State or federal court in this matter. See State court docket sheet, attached hereto as **Exhibit B**.
5. On January 30, 2023, Kaiser filed a Notice of Removal with the Superior Court of New Jersey, attached hereto as **Exhibit C**.

I hereby certify that the foregoing statements are true and that all documents and reports annexed hereto are exact copies of the entire original document or report. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: February 21, 2023 By: /s/ Gregory J. Hazley